

Subject: KIOF 97.9 FM Mail Bag
From: "Gregory P. LaPorta" <greg@lvpr.org>
Date: 8/20/19, 11:17 PM
To: Ajit.Pai@fcc.gov
CC: Jessica.Rosenworcel@fcc.gov, geoffrey.starks@fcc.gov, hmollick@cpb.org, Andy LaPorta <andy@lvpr.org>

To: The Honorable Ajit Pai, FCC Chairman
Cc: Jessica Rosenworcel, FCC Commissioner
Cc: Geoffrey Starks, FCC Commissioner
Cc: Helen Mollick, Corporation for Public Broadcasting, Office Of Inspector General
Cc: Andrew LaPorta, Las Vegas Public Radio Inc. Vice President

Chairman Pai,

It's not everyday I get the opportunity to share feedback with you on issues that directly effect services provided by the FCC to communities nationwide. Periodically, I will get an email forwarded to me by station staff from the KIOF 97.9 FM Mail Bag that stands out and is of interest which I would like to share with you and other Commissioners that relates to the July 30, 2019 - Notice of Proposed Rulemaking on Improving Low Power FM Radio Service (MB Docket No. 19-193/MB Docket No. 17-105) at <https://docs.fcc.gov/public/attachments/FCC-19-74A1.pdf> or the attached PDF in these particular areas:

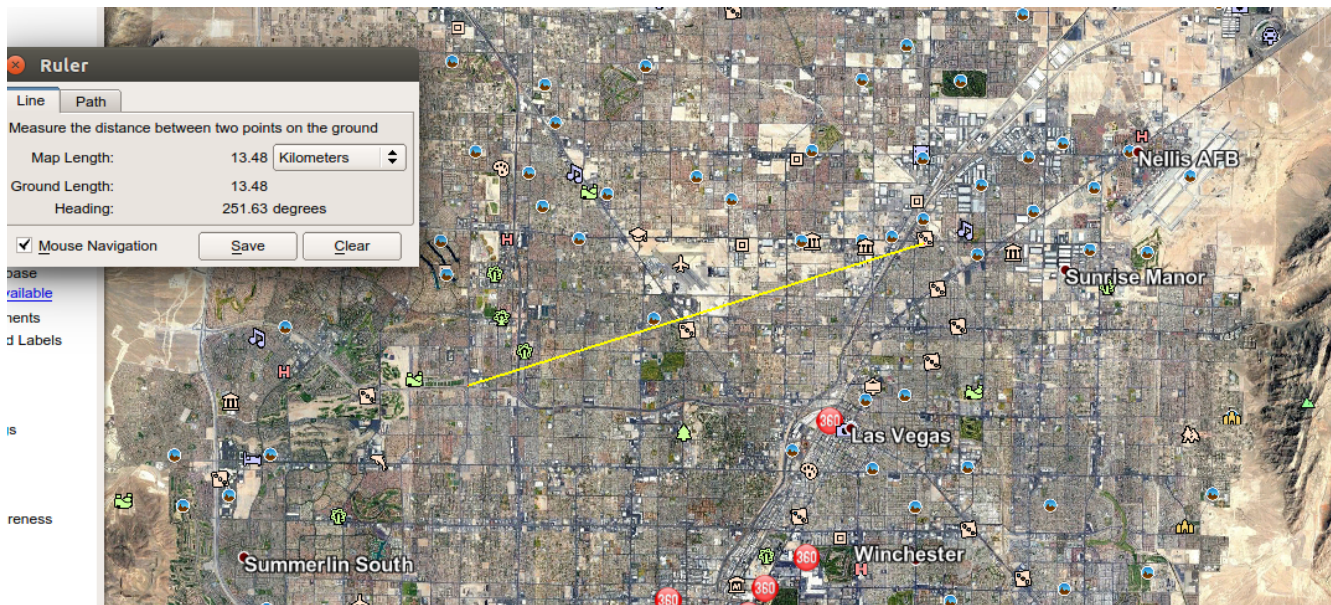
On Page 2 and 3 - Item #3, discussion was made regarding rule changes to address difficulties LPFM stations may experience when trying to maximize coverage of their target communities. For example, it seeks more options in equipment used to transmit and re-transmit LPFM signals, increased power, greater flexibility in relocating LPFM facilities, and additional methods for demonstrating interference protection to other stations ... February 2019 Notice of Proposed Rulemaking in the Comparative Standards proceeding.

On Page 11 - Item #22, discussion was made regarding few commenters submitted suggestions for Commission... emergency alert service (EAS) requirements for LPFM stations.

On Page 12 - Item #22 continues at the top paragraph ... Jim Knybel, while supporting EAS participation if LPFM stations can increase power, argues that currently "[a]n emergency alert system on an unlistenable channel serves no purpose."

In the KIOF 97.9 FM Mail Bag for Tuesday, August 20, 2019, a listener wrote in to KIOF 97.9 FM, "I recently listened to your station online, as it doesn't reach Buffalo and Summerlin Parkway very well over the air. That's to be expected with your limitations of low power FM licensing. The mix of music is very good."

Now let's look at this for a minute - the listener is being pushed to listen to KIOF 97.9 FM "online" instead of through traditional methods by tuning in with their standard FM radio here in our community being Las Vegas, Nevada. Let's look exactly on the map from the KIOF 97.9 FM tower site to where this particular listener is at Buffalo and Summerlin Parkway when tuning in to listen to KIOF 97.9 FM in our community of license:



Let's look again at the EAS system and the comment made on Page 11 where Item #22 starts off regarding emergency alert service (EAS) requirements for LPFM stations: Sibert, for example, asks the Commission to eliminate EAS requirements because he views EAS participation as costly, burdensome, and unnecessary for LPFM stations. He contends listeners will likely turn to full service broadcast stations for news about national emergencies. **THIS IS ABSOLUTELY A FALSE STATEMENT made by Sibert and listeners do have a choice in their communities to which station they would like to listen to including hearing EAS alerts on those stations similarly generated by KIOF 97.9 FM.** Sibert obviously doesn't understand fair market competition and is a "fan of keeping the system rigged".

Chairman Pai - a simple common sense question to you and the other Commissioners at the FCC - who exactly at the FCC has been holding back LPFM stations continually at a measly 100 watts after 20 years of a sub-par service? Operational power beyond a measly 100 watts is needed to adequately maintain and serve communities so this service can thrive across the United States for the next 20 years. Will we all actually see the LPFM service go beyond 100 watts by the time gray hair has fully set in for everyone?

As we know, anti-competitive business discussion was seen directly with LPFM by the Small Business Administration (SBA) discussion included in the July 30, 2019 - Notice of Proposed Rulemaking on Improving Low Power FM Radio Service (MB Docket No. 19-193/MB Docket No. 17-105). An area which failed to be discussed and I include with this email to you - consecutive denials without any sort of waivers to an LPFM (i.e. KIOF 97.9 FM) by the Corporation for Public Broadcasting in 2016, 2017 and 2018 along with our 2019 application for a Community Service Grant still pending. This surely promotes anti-competitive business practices around LPFM based on the SBA discussion which only proves the Corporation for Public Broadcasting has worked for a few at the expense of the many.

Chairman Pai - the FCC indeed is picking winners and losers in market places throughout the United States which goes directly against your remarks made back on July 3, 2019 at the Congreso LatinoAmericano De Telecomunicaciones in Cordoba, Argentina (<https://docs.fcc.gov/public/attachments/DOC-358304A1.pdf> or the other attached PDF). On Page 4 you state, "The FCC does not pick winners and losers in our domestic marketplace, and we carry that same philosophy forward internationally."

I submit this comment to you directly outside of the normal corrupt FCC's commenting system so you can see and hear directly from an LPFM station on what is exactly needed for Improving Low Power FM Radio Service.

With the Most Respect and Honor, Sir.

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— Attachments: —

DOC-358304A1.pdf	73.5 kB
FCC-19-74A1.pdf	416 kB